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Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JANE ROE, an individual; MARY ROE, an individual; SUSAN ROE, an individual; JOHN ROE, an individual; BARBARA ROE, an individual; PHOENIX HOTEL SF, LLC, a California limited liability company; FUNKY FUN, LLC, a California limited liability company; and 2930 EL CAMINO, LLC, a California limited liability company,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO, a California public entity,

Defendant.

Case No. 4:24-cv-01562-JST

**STIPULATION AND [PROPOSED] ORDER
PERMITTING NON-PARTY DEPOSITION
AFTER FACT DISCOVERY CUTOFF**

Trial Date: August 10, 2026

STIPULATION

WHEREAS, Plaintiffs submitted the declaration of non-party Randy Shaw in support of their motion for a preliminary injunction (*see* ECF No. 101-3);

WHEREAS, Defendant served a deposition subpoena on non-party Randy Shaw and, after consulting with his counsel, agreed to a deposition date of December 22, 2025;

WHEREAS, due to a power outage affecting certain areas of San Francisco on December 22, 2025, including the City Attorney's Offices where Mr. Shaw's deposition was scheduled to take place, the deposition was cancelled and the parties agreed to reschedule in January 2026 at a date convenient for Mr. Shaw and the parties;

WHEREAS, the fact discovery cutoff is Monday, January 5, 2026 (ECF No. 99).

THEREFORE, IT IS HEREBY AGREED AND STIPULATED that:

1. Defendant may depose non-party Rany Shaw at a date convenient for Mr. Shaw and the parties in January 2026 after the January 5, 2026 fact discovery cutoff.

Dated: December 23, 2025

DAVID CHIU
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TARA M. STEELEY
JOHN H. GEORGE
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By: /s/John H. George
JOHN H. GEORGE

Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

1
2 Dated: December 23, 2025

WALKUP, MELODIA, KELLY & SCHOENBERGER

3 By: **Ashcon Minoiefar

4 ASHCON MINOIEFAR

5 Attorneys for Plaintiffs

6 JANE ROE, MARY ROE, SUSAN ROE, JOHN ROE,
7 BARBARA ROE, PHOENIX HOTEL SF, LLC, FUNKY
8 FUN, LLC, and 2930 EL CAMINO, LLC

8 Dated: December 23, 2025

MURPHY, PEARSON, BRADLEY, & FEENEY P.C.

9 By: **Mark Perelman

10 MARK PERELMAN

11 Attorneys for Non-Party Randy Shaw

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13 ***Pursuant to L.R. 5-1(h)(3), the electronic signatory attests that each of the other Signatories have
14 concurred in the filing of this document.*
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[PROPOSED] ORDER

Pursuant to the parties' stipulation, Federal Rule of Civil Procedure 29, and for good cause shown, Defendant City and County of San Francisco may depose non-party Rany Shaw at a date convenient for Mr. Shaw and the parties in January 2026 after the January 5, 2026 fact discovery cutoff.

Date: _____

The Honorable Jon S. Tigar
UNITED STATES DISTRICT COURT